

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED UNDER SEAL

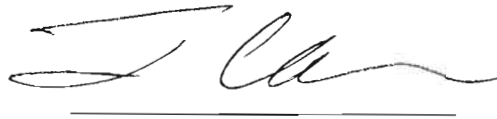
UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

MOTION TO SEAL MOTION FOR FURTHER EXTENSION OF TIME
TO FILE IN LIMINE DAUBERT MOTION REGARDING
TAPE, POLYMER AND FABRIC MATCHES

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests leave to file his motion to extend to time to file an additional Daubert motion under seal. Leave to file under seal is requested because the motion concerns non-public discovery and evidentiary disclosures that are subject to the Protective Order [DE 91] in this case. Recognizing that some or all of the materials referred to in the motion may well become public during trial, defendant requests only that the documents remain under seal until such time as public disclosure at a preadmission hearing or at trial is necessary. The Government has previously indicated that while it does not concede that sealing is legally required, it assents to the motion in an abundance of caution.

Respectfully submitted,

DZHOKHAR TSARNAEV
By his attorneys



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Certificate of Service

I hereby certify that this document was served on counsel for the government by email and paper copy by interoffice delivery on December 12, 2014.



Timothy G. Watkins